



DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY

5000 OVERLOOK AVENUE, S. W., WASHINGTON, D. C. 20032

September 1, 2005

Ms. Karen Johnson, Chief
Safe Drinking Water Act Branch
United States Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Report on Plan for Update of Materials Evaluation and Lead Service Inventory

Dear Ms. Johnson:

In accordance with Administrative Order (AO) for Compliance Docket No. SDWA-03-2004-0259DS, Part III. Order, Paragraph 63, and DC WASA's plan submitted August 1, 2004 and approved by EPA by letter dated September 29, 2004, the following is a report that includes:

1. A plan to resolve the remaining unknown services not actually replaced to date; Item B.3.b) of WASA's submitted and approved plan.
2. An update of the June 2001 Baseline Inventory.

1. Plan to resolve the remaining unknown services not actually replaced to date.

Under the provisions of the LCR WASA would be required to complete the replacement of all lead services during the 14 years period beginning October 1, 2001 and ending September 30, 2015, if the lead level in our distribution system exceeded the lead action level over this entire period of time. As you know, DC WASA was below the lead action level for the January – June 2005 compliance monitoring period. Therefore, this Plan is presented to comply with the AO, premised on the situation that existed at that time. In order to support this replacement schedule the number of unknowns would need to be reduced to zero by the inventory update a year earlier or, stated differently, by September 1, 2014.

To meet this regulatory schedule, DC WASA proposes to determine the materials of construction of a minimum of 12% of the unknowns a year through September 1, 2014 through the regulatory or DC WASA Board directed replacement program as well as supplemental test pitting. As the replacement program will concentrate in areas of "high probability" of the services being made of lead, coupled with the need to develop a list of the exact addresses for replacement one to two years ahead of the construction work, it may be necessary to exceed this percentage in any given year in order to support the orderly implementation of the replacement program.

As it is in DCWASA's best interest to insure that the determination of unknown services supports the regulatory or DC WASA Board directed replacement program, DC WASA agrees to adjust the number of unknown determinations annually and to include any adjusted number of determinations for the coming fiscal years in its annual lead service update. DC WASA will submit an annual updated materials evaluation and inventory and inventory, and quarterly progress reports during the effective period of the Administrative Order.

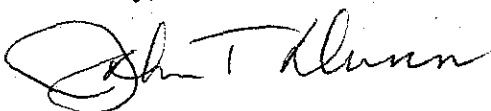
2. Update of the June 2001 Baseline Inventory as of August 24, 2005

A. June 2001 Baseline Inventory (submitted Sept. 1, 2004)	23,637
B. Unknowns Identified as Lead (additive):	
1. During replacement program thru 8/24/05	893
2. During 1200 test pit program	388
C. Lead Inventory Identified as other than Lead (subtracting):	
1. During replacement program thru 8/24/05	(530)
2. During 1200 test pit program	-
D. Further correction of inventory via research and update of CIS (additive): ^{Note 1}	4,737
E. Revised June 2001 Baseline Inventory (revision date 8/24/05)	<u>29,107</u>
F. Physical Replacements thru August 24, 2005	(5,563)
G. Remaining Lead Inventory	<u>23,544</u>
H. Remaining number of "unknowns" ^{Note 1}	<u>21,773</u>

Note 1: Reflects results of input of all available data into the WASA Customer Information System in addition to removal of abandoned services from inventory. The abandoned services no longer exist or if returned to service would require a new service line.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Sincerely,



John T. Dunn, P.E.
Chief Engineer / Deputy General Manager